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Attorneys for Defendant RAMON DESAGE

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
RAMON DESAGE, )  
 )  
Defendant. )  
\_\_\_\_\_ )

Case No.: 2:13-cr-00039-JAD-VCF

**AMENDED UNOPPOSED MOTION TO  
TRAVEL AND PROPOSED ORDER**

Comes now, Defendant Ramon Desage, by and through his counsel, Richard A. Wright, Esquire and Richard B. Herman, Esquire, and hereby moves this Court for permission to amend Mr. Desage's travel dates from Las Vegas, Nevada to New York City to September 8, 2015 and returning on September 10, 2015. While in New York City, Mr. Desage will be meeting with attorneys and he will be staying at the St. Regis Hotel, 2 East 55th Street, New York, New York. On August 11, 2015, August 12, 2015 and August 19, 2015 the Court approved Mr. Desage's initial travel motions; unfortunately, Mr. Desage's meeting in New York has been repeatedly cancelled and we are trying to reschedule with the Court's approval.

1 On September 1, 2015, Richard B. Herman, Counsel for Mr. Desage, personally discussed  
2 Mr. Desage's initial travel request with Pre-Trial Services Officer Zack Bowen, who advises he  
3 consents to this travel request. Mr. Herman provided Officer Bowen with Mr. Desage's travel  
4 itinerary and hotel information. Mr. Desage will continue with electronic monitoring and will abide  
5 by all other bail conditions. Upon his return to Las Vegas on September 10, 2015, Mr. Desage will  
6 give a courtesy call to Officer Bowen.

7 Counsel for Mr. Desage has discussed the initial request with Assistant United States  
8 Attorney Gregory Damm, who has no opposition to it.

9 DATED this 1st day of September 2015.

10 Respectfully submitted:

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12  
13 BY /s/ Richard A. Wright  
14 RICHARD A. WRIGHT, ESQUIRE  
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17 Las Vegas, NV 89101  
18 Telephone: (702) 382-4004  
19 Attorney for Defendant, Ramon Desage

20 BY /s/ Richard B. Herman  
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27 Attorney for Defendant, Ramon Desage

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**ORDER**

This matter having come before the Court on the amended unopposed motion of Defendant Ramon Desage, and good cause appearing, Defendant's Motion for Permission to Travel to New York City on September 8, 2015 and returning September 10, 2015 is **GRANTED**.

  
HONORABLE JENNIFER A. DORSEY

Dated this 2nd day of September, 2015.

Respectfully submitted by:

WRIGHT STANISH & WINCKLER

By /s/ Richard A. Wright  
RICHARD A. WRIGHT

RICHARD B. HERMAN, P.C.

By /s/ Richard B. Herman  
RICHARD B. HERMAN